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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SCOTT B. UGELL,

Chapter 11

Case No. 19-22239 (rdd)

Debtor.

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**APPLICATION FOR ORDER EXTENDING TIME FOR
FILING SCHEDULES OF ASSETS AND LIABILITIES AND
STATEMENT OF FINANCIAL AFFAIRS**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE:**

Scott B. Ugell, the above-captioned debtor and debtor-in-possession (the “Debtor”), by his proposed attorneys, DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, hereby submits this application (the “Application”) for entry of an order extending the Debtor’s time to file his Schedules of Assets and Liabilities and Statement of Financial Affairs (collectively, the “Schedules”). In support of this Application, the Debtor respectfully states as follows:

Jurisdiction

1. The Court has jurisdiction over this Application under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are §§ 521 of Title 11 of the United States Code, 11 U.S.C. §§101, et seq. (the “Bankruptcy Code”) and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Background

3. On February 11, 2019 (the “Filing Date”), the Debtor filed a voluntary petition for reorganization pursuant to Chapter 11 of the Bankruptcy.

4. The Debtor has continued in possession of its business and management of its business affairs pursuant to §§ 1107 and 1108 of the Bankruptcy Code. No trustee, examiner or creditors' committee has been heretofore appointed in this proceeding.

RELIEF REQUESTED

5. The Debtor is an individual with various business interests. The immediate cause of the chapter 11 filing was a litigation in which the Debtor was anticipating a judgment would likely be entered, resulting in a lien on real property and judgment collection efforts by the creditor.

6. The Debtor and his proposed counsel believe an extension of time to file the Schedules is appropriate to give the Debtor time to fully and accurately report all of his business interests, assets and liabilities.

7. The current deadline to file Schedules is February 25, 2019 proposed extension of March 11, 2019, which is two days before the Meeting of Creditors pursuant to 11 U.S.C. §341. The Debtor believes this will provide sufficient time for the Office of the United States Trustee to review the Schedules prior to that meeting. The Schedules are not anticipated to be lengthy or complex.

8. No prior request for the relief sought herein has been made heretofore.

WHEREFORE, the Debtor respectfully requests that the Court enter the pre-fixed Order extending the date by which the Debtor's Statement of Financial Affairs and Schedule of Assets and Liabilities must be filed through March 11, 2019, and for such other and further relief as is just and proper under the circumstances.

Dated: White Plains, New York
February 25, 2019

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By: /s/ Dawn Kirby
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